



**DIVISION OF
ENFORCEMENT**

**UNITED STATES
SECURITIES AND EXCHANGE COMMISSION**
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March 30, 2022

VIA ECF

Cathy L. Waldor
United States Magistrate Judge
United States District Court
District of New Jersey
Martin Luther King Building Courthouse
50 Walnut Street, Room 4040, Courtroom 4C
Newark, NJ 07101

Re: SEC v. Vuuzle Media Corp., et al.; Case No. 2:21-cv-01226 (D.N.J.)

Dear Judge Waldor:

We write in response to Defendant Vuuzle Media Corp.'s Renewed Motion to Stay, which was filed on March 24, 2022 (Dkt. No. 108). Vuuzle had earlier filed a nearly identical Motion to Stay on February 28, 2022 (Dkt. No. 90). The SEC filed its Response to that Motion on March 21, 2022 (Dkt. Nos. 104 to 104-10). Because Vuuzle's original Motion and "Renewed" Motion are essentially identical, the SEC stands by its arguments in its March 21, 2022 Opposition. Should the Court prefer that the SEC file a new Opposition, the SEC is happy to comply.

Respectfully Submitted,

/s/ Devon Staren
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CERTIFICATE OF SERVICE

I hereby certify that on March 30, 2022, I served a copy of the foregoing upon all counsel of record using this Court's ECF system, and upon Defendant Flynn using the email rflynn48@gmail.com.

/s/ Devon Staren
Counsel for Plaintiff